

Dominion Nuclear Connecticut, Inc.  
Millstone Power Station  
Rope Ferry Road  
Waterford, CT 06385



MAR 15 2002

Docket No. 50-336  
B18611

RE: 10 CFR 50.55a(a)(3)(i)

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

**Millstone Nuclear Power Station, Unit No. 2  
Request RR-89-35 Modifications Regarding Use of Mechanical Nozzle Seal  
Assemblies for Pressurizer Heater Penetration Nozzles (TAC No. MB4039)**

In a letter dated February 28, 2002,<sup>(1)</sup> Dominion Nuclear Connecticut, Inc. (DNC) submitted additional information to the Nuclear Regulatory Commission (NRC) regarding a request to use mechanical nozzle seal assemblies (MNSAs) as an alternate repair method pursuant to 10 CFR 50.55a(a)(3)(i) for Millstone Unit No. 2. The purpose of this submittal is to supply the Design Stress Report in response to question number five (5) of the February 28, 2002, letter.

Application for Withholding Pursuant to 10 CFR 2.790

Enclosure 1 of Attachment 1 provides the Design Stress Report for the Millstone Unit No. 2 pressurizer, completed by Westinghouse Electric Company for DNC. Westinghouse considers the material provided in Enclosure 1 to be proprietary information, and as such requests that it be exempt from public disclosure for commercial reasons. Therefore, pursuant to 10 CFR 2.790, it is requested that the Design Stress Report (Enclosure 1 of Attachment 1) be withheld from public disclosure. Upon separation of Enclosure 1 of Attachment 1 from this letter, this letter may be decontrolled.

There are no regulatory commitments contained within this letter.

---

<sup>(1)</sup> J. A. Price letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Request RR-89-35 Modifications Regarding Use of Mechanical Nozzle Seal Assemblies for Pressurizer Heater Penetration Nozzles (TAC No. MB4039)," dated February 28, 2002.

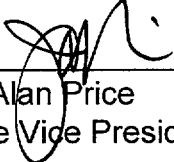
AP01

US. Nuclear Regulatory Commission  
B18611/Page 2

Should there be any questions regarding this submittal, please contact Mr. Ravi G. Joshi at (860) 440-2080.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.



---

J. Alan Price  
Site Vice President - Millstone

Enclosure (1)

Attachment (1)

cc: H. J. Miller, Region I Administrator  
R. B. Ennis, NRC Senior Project Manager, Millstone Unit No. 2  
NRC Senior Resident Inspector, Millstone Unit No. 2

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Response to Question Five (5)  
from the February 28, 2002, Submittal

Response to Question Five (5) from the  
February 28, 2002, Submittal

Question 5

In section 4.2 of your submittal MNSP [Millstone Unit No. 2] identify a Design Stress Report that is being prepared, please provide that report to the NRC prior to restart of Unit 2.

Response

Enclosure 1 provides the Design Stress Report for the Millstone Unit No. 2 pressurizer, completed by Westinghouse Electric Company for Dominion Nuclear Connecticut, Inc. Westinghouse considers the material provided in Enclosure 1 to be proprietary information, and as such requests that it be exempt from public disclosure for commercial reasons.

Enclosure 1

Affidavit from Westinghouse Electric Company to  
Withhold Proprietary Information  
and  
Millstone Unit No. 2 Pressurizer Design Stress Report



I, Ian C. Rickard, depose and say that I am the Licensing Manager of Westinghouse Electric Company, LLC (WEC), duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and described below.

I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information. I have personal knowledge of the criteria and procedures utilized by WEC in designating information as a trade secret, privileged, or as confidential commercial or financial information.

The information for which proprietary treatment is sought, and which has been appropriately designated as proprietary, is contained in the following:

- *Design Report No. DAR-CI-02-3, Rev 0, "Addendum to CENC-1180, Analytical Report for Northeast Utilities Service Company Millstone Point Station Unit 2 Pressurizer," dated 3/05/02.*

Pursuant to the provisions of Section 2.790(b)(4) of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information listed above should be withheld from public disclosure.

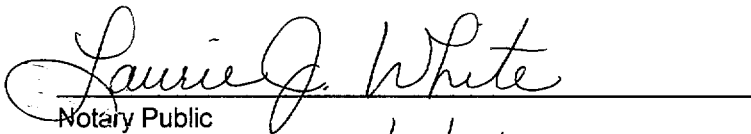
1. The information sought to be withheld from public disclosure is owned and has been held in confidence by WEC. It consists of information concerning application, qualification and evaluation details for mechanical nozzle seal assemblies.
2. The information consists of specifications, design reports and calculations or other similar data for the design, evaluation or application of mechanical nozzle seal assemblies, the application of which results in substantial competitive advantage to WEC.
3. The information is of a type customarily held in confidence by WEC and not customarily disclosed to the public.
4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.
5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements that provide for maintenance of the information in confidence.
6. Public disclosure of the information is likely to cause substantial harm to the competitive position of WEC because:
  - a. A similar product or service is provided by competitors of Westinghouse.
  - b. WEC has invested substantial funds and engineering resources in the development of this information. A competitor would have to undergo similar expense in generating equivalent information.

- c. The information consists of technical data and qualification information for mechanical nozzle seal assemblies, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to design their product to better compete with WEC, take marketing or other actions to improve their product's position or impair the position of WEC's product, and avoid developing similar technical analysis in support of their processes, methods or apparatus.
- d. Significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included in pricing WEC's products and services. The ability of WEC's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.
- e. Use of the information by competitors in the international marketplace would increase their ability to market competing systems by reducing the costs associated with their technology development.

Sworn to before me this  
14<sup>th</sup> day of March 2002



Ian C. Rickard  
Licensing Manager  
Westinghouse Electric Company LLC

  
Notary Public

My commission expires: 8/31/04